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By: Kiley D. Scott, Esq.

**UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS**

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MARK REAVES,	)	<b>Case No. 04-30125-MAP</b>
	)	
Plaintiff,	)	
v.	)	
	)	
MASSACHUSETTS ARMY NATIONAL GUARD and ADJUTANT GENERAL	)	<b>MOTION TO EXTEND DISCOVERY TIME</b>
RAYMOND A. VEZINA	)	<b>TIME PERIODS</b>
	)	
Defendant(s).	)	
	)	

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TO: Attorney James S. Whitcomb  
Office of the Attorney General  
Western Massachusetts Division  
1350 Main Street  
Springfield, Massachusetts 01103

PLAINTIFF, MARK REAVES, through his attorney Kiley D. Scott, Esq., files this Motion to extend discovery time periods.

**I.**

The deadline for answering discovery is June 27, 2008.

**II.**

Counsel was granted admission, Pro Hac Vice to the instant matter on or about June 17, 2008, ten days before the discovery deadline.

**III.**

Counsel respectfully request a sixty-day extension of time in which to respond to discovery.

WHEREFORE, counsel respectfully prays for an order granting the plaintiff an additional sixty days in which to answer discovery, no prior application for relief has been made.

Dated: June 24, 2008

Respectfully submitted,



Kiley D. Scott, Esq.  
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